

February 4, 2025

By E-mail

Ms. Holly Tapani
U.S. Environmental Protection Agency
ENERGY STAR Appliances Program

HVAC@energystar.gov

Re: Room Air Conditioner (RAC) ENERGY STAR Specifications

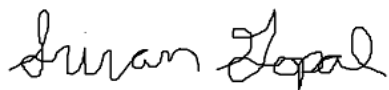
Dear Mr. Leybourn:

The Association of Home Appliance Manufacturers (AHAM) respectfully submits the following supplemental comments.

EPA should not require labels for appliances other than the ENERGY STAR mark. Such requirements go outside of EPA’s authority and beyond the scope of the ENERGY STAR program. As we have commented in the past, EPA must not stray from its strategic vision for the ENERGY STAR program, which is to remove barriers in the market that deter consumers and others from purchasing the most energy-efficient product model that otherwise meets their needs. In fact, the ENERGY STAR program was authorized by 42 U.S.C. § 6294(a) “to identify energy efficient products”—nothing else. The ENERGY STAR program must remain squarely focused on energy efficiency.

AHAM encourages EPA to promote voluntary labelling related to cut-in and cut-out temperatures for room heat pumps. AHAM may create a label which EPA can promote for voluntary use and would be glad to discuss this further should you request.

Respectfully submitted,



Sriram Gopal
Director, Technology and Environmental Policy
Association of Home Appliance Manufacturers